unpatentable over Stupek, Jr., et al. and Burns, et al. as applied to claims 1 and 18 and further in view of the U.S. Patent to Shipley.

These rejections are respectfully traversed.

Initially, the U.S. Patent to Stupek, Jr., et al. describes a method for use in upgrading a resource of a computer from an existing version of that resource to a later version of the same resource. In other words, the invention attempts to help one determine whether to upgrade or not by helping the user to perform a cost-benefit analysis.

The U.S. Patent to Burns, et al. discloses a method of reconstructing a version of a file in place where data storage space and memory resources are limited. Two versions of the same data or file are utilized and differencing methods are used to find changes made between the two versions. As shown in Figure 6 of the U.S. Patent to Burns, et al. and as described in column 8, lines 42-47, conflicts occur when delta file commands require the delta file to a first write to a region of memory then later read from the same region.

The U.S. Patent to Shipley merely describes a system wherein a program asks a DLL if it supports a certain version number. The DLL itself is written containing a table of version numbers it supports. The DLL then lets the program know whether or not it supports the version the program is requesting.

Each of the above-noted prior art references misses the mark of the present invention as claimed in independent claims 1, 16 and 18 which specifically claim and particularly point out that "change information represents actual changes made to a computer system's files and other shared resources during installation of different applications into the computer system." "Different applications" as specifically claimed in independent claims 1, 16 and 18 does not mean different versions of the same application as taught by both Stupek, Jr., et al. and Burns, et al. Furthermore, this "change information represents actual changes made to a computer system's files and other shared resource during installation of different

applications." Clearly, this claimed feature is neither taught, disclosed nor discussed by either Stupek, Jr., et al. or Burns, et al. taken either alone or in combination with one another.

Furthermore, there is no teaching or suggestion to combine the teachings of Stupek, Jr., et al. and Burns, et al. For example, Stupek, Jr., et al. is merely concerned with providing a cost-benefit analysis to an end user to help the end user decide whether to upgrade from an existing computer resource, such as software, to a later version of the same software.

On the other hand, Burns, et al. provides reconstruction of a newer version of the same program or a file at a location having reduced data storage space or memory resources.
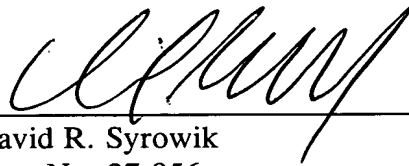
Again, there is no teaching in either Stupek, Jr., et al. or Burns, et al. to determine change information which represents actual changes made to a computer system's files and other shared resources during installation of _different_ applications. Again, Stupek, Jr., et al. and Burns, et al. are concerned with different versions of the same application and not different applications. Furthermore, only with the present invention is change information determined which represents actual changes made to a computer system's files and other shared resources during installation of the different applications. No such information is provided by either Stupek, Jr., et al. or Burns, et al.

Consequently, in view of the above and in the absence of better art than that art already of record in this application, Applicants' attorney respectfully submits that the application is in condition for allowance which allowance is respectfully requested.

Respectfully submitted,

John J. McMillan, et al.

By_____

David R. Syrowik
Reg. No. 27,956
Attorney/Agent for Applicant

Date: <u>February 20, 2002</u>

BROOKS & KUSHMAN P.C.
1000 Town Center, 22nd Floor
Southfield, MI 48075
Phone: 248-358-4400
Fax: 248-358-3351